

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

UNITED STATES POSTAL SERVICE
INTERROGATORY AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
DIRECT MARKETING ASSOCIATION ET AL. WITNESS BUC
(USPS/DMA-T1-18)

Pursuant to rules 25 and 26 of the Rules of Practice and procedure, the United States Postal Service directs the following interrogatory and request for production of documents to Direct Marketing Association et al. witness Buc: USPS/DMAA-T1-18.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Scott L. Reiter

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June 19, 2000

USPS/DMA-T1-18 Please refer to AttC-dma-t-1.xls that accompanies your testimony.

- a. Please confirm that the "AFSM Productivity" in column [3] is an estimated throughput of the AFSM 100 and is not pieces sorted per workhour. If you do not confirm, please explain.
- b. Please explain if you believe the throughput takes into account the time the AFSM is not feeding mail due to scheme changes, sweeping, jams, and other operational stoppages.
- c. Please explain why for column [1] "Direct Cost per Handling" you assume a volume variability factor of 1.0, instead of what was contained in the LR-I-90 mailflow models?
- d. Please provide the same information in your DMA AFSM100 Clerk TY Savings chart using the volume variability factors found in LR-I-90.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Scott L. Reiter", is written over a horizontal line.

Scott L. Reiter

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